

In the United States District Court
Northern District of Texas
Fort Worth Division

United States of America §
§
v. § Case No. 4:13-CR-222-O
§
Charlsa Suzanne Little (6) §

Factual Résumé

Indictment

Count One: Conspiracy to Possess a Controlled Substance with Intent to Distribute (methamphetamine) in violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

Maximum Penalties

A \$5,000,000 fine; not less than 5 years' imprisonment, and not more than 40 years' imprisonment; or both such fine and imprisonment, plus a term of supervised release of not less than 4 years. Further, if the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further, the Court must impose a mandatory special assessment of \$100.00.

Elements of the Offense

To establish the offense alleged in count one of the indictment, the government must prove each of the following elements beyond a reasonable doubt:

- First:* That two or more persons, directly or indirectly, reached an agreement to possess with the intent to distribute a controlled substance, namely methamphetamine;
- Second:* That the defendant knew of the unlawful purpose of the agreement; and
- Third:* That the defendant joined in the agreement willfully; that is, with the intent to further its unlawful purpose; and
- Fourth:* That the overall scope of the conspiracy involved at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

Stipulated Facts

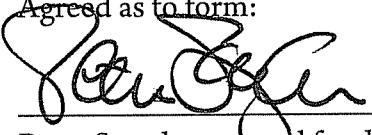
In 2012, Charlsa Suzanne Little bought at least two ounces of a mixture or substance containing a detectable amount of methamphetamine from Brittany Barron in Fort Worth, Texas area. In turn, Little resold the ounces to René Murphy in the Comanche, Texas area. Fort Worth and Comanche, Texas are within the Northern District of Texas.

Signed this the 12 day of January 2014.



Charlsa Suzanne Little

Agreed as to form:



Peter Smythe, counsel for defendant